

SCOTT N. SCHOOLS
United States Attorney

FILED

07 AUG 23 PM 4:36

RICHARD W. WILKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOMINIC CHANG,

Defendant.

No. CR-

VIOLATIONS: 26 U.S.C. § 7201-
Tax Evasion (Three Counts)

SAN JOSE VENUE

I N D I C T M E N T

The Grand Jury charges:

COUNT ONE: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax)

That on or about the 20th day of May, 2002, in the Northern District of California, Dominic Chang, a resident of Milpitas, California, did willfully attempt to evade and defeat a large part of the income tax due and owing by him to the United States of America for the calendar year 1999, by causing to be prepared, and by signing and causing to be signed, a false and fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal Revenue Service, wherein he stated that his taxable income for said calendar year was the sum of zero dollars, and that the amount of tax due and owing thereon was the sum of \$804, whereas, as he then and there well knew and believed, his taxable income for the said calendar year was the

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1 sum of \$48,561, upon which taxable income there was owing to the United States of America an
2 income tax of \$21,746.

3 In violation of Title 26, United States Code, Section 7201.

4 COUNT TWO: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax)

5 That on or about the 30th day of October, 2002, in the Northern District of California,
6 Dominic Chang, a resident of Milpitas, California, did willfully attempt to evade and defeat a
7 large part of the income tax due and owing by him to the United States of America for the
8 calendar year 2000, by causing to be prepared, and by signing and causing to be signed, a false
9 and fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal
10 Revenue Service, wherein he stated that his taxable income for said calendar year was the sum of
11 zero dollars, and that the amount of tax due and owing thereon was the sum of \$2,442, whereas,
12 as he then and there well knew and believed, his taxable income for the said calendar year was the
13 sum of \$185,607, upon which taxable income there was owing to the United States of America an
14 income tax of \$67,074.

15 In violation of Title 26, United States Code, Section 7201.

16 COUNT THREE: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax)

17 That on or about the 29th day of January, 2004, in the Northern District of California,
18 Dominic Chang, a resident of Milpitas, California, did willfully attempt to evade and defeat a
19 large part of the income tax due and owing by him to the United States of America for the
20 calendar year 2001, by causing to be prepared, and by signing and causing to be signed, a false
21 and fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal
22 Revenue Service, wherein he stated that his taxable income for said calendar year was the sum of
23 zero dollars, and that the amount of tax due and owing thereon was the sum of \$3,000, whereas,
24 as he then and there well knew and believed, his taxable income for the said calendar

25 ///

26 ///

27 ///

28

1 year was the sum of \$218,536, upon which taxable income there was owing to the United States
2 of America an income tax of \$80,924.

3 In violation of Title 26, United States Code, Section 7201.

4 A True Bill

5 Dated: 8-23-07

6 
FOREPERSON

7
8 SCOTT N. SCHOOLS
United States Attorney

9 
10 BRIAN STRETCH
11 Chief, Criminal Section

12 Approved as to Form

13
14 AUSA: 
THOMAS MOORE

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

26 USC § 7201 - 3 counts

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony**PENALTY:**

26 USC § 7201 - 5 yrs impris., \$100,000 fine, 3 yr superv. rel., \$100 Spec. Assessment

E-Filed

CR

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIAFILED
AUG 23 PM 4:36

DEFENDANT - U.S.

RICHARD W. WILLIAMS
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DOMINIC CHANG

DISTRICT COURT NUMBER

07

0554

JF

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

INTERNAL REVENUE SERVICE

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW
DOCKET NO.MAGISTRATE
CASE NO.Name and Office of Person
Furnishing Information on
THIS FORM

SCOTT N. SCHOOLS

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

THOMAS MOORE, AUSA, TAX DIV.

DEFENDANT**IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

NORTHERN DISTRICT OF CALIFORNIA

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainee been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☒ SUMMONS ☐ NO PROCESS*☐ WARRANT Bail Amount: _____

If Summons, complete following:

☒ Arraignment ☒ Initial AppearanceDefendant Address:
1080 REMBRANDT DRIVE
SUNNYVALE, CA 94807

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Sept. 13, 2007 @ 9:00 AM

Before Judge: Judge Patricia V. Trumbull

Comments: Contact IRS Special Agent Cecilia Braga re service of Summons (925) 260-7926